

# 2002 FCC Form 499-A Telecommunications Reporting Worksheet

Page 6

Block 3: Administrative Information

|  |                      |
|--|----------------------|
| 501 Filer 499 ID [from Line 101]                   | 812286               |
| 502 Legal name of reporting entity [from Line 102] | WORLD-LINK SOLUTIONS |

Most filers must contribute to LNP administration and must provide the percentages requested in Lines 503 through 510. Filing entities that use Line 603 to certify that they are exempt from this requirement need not provide this information.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

|     |               |   | Block 3<br>Carrier's<br>Carrier<br>(a) | Block 4<br>End-User<br>Telecom.<br>(b) |
|-----|---------------|---|--|--|
| 503 | Southeast:    | Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands        | %                                      | 7.98 %                                 |
| 504 | Western:      | Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming | %                                      | 3.19 %                                 |
| 505 | West Coast:   | California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island.                          | %                                      | 29.45 %                                |
| 506 | Mid-Atlantic: | Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia   | %                                      | 27.42 %                                |
| 507 | Mid-West:     | Illinois, Indiana, Michigan, Ohio, and Wisconsin  | %                                      | 2.83 %                                 |
| 508 | Northeast:    | Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont   | %                                      | 28.65 %                                |
| 509 | Southwest:    | Arkansas, Kansas, Missouri, Oklahoma, and Texas   | %                                      | .48 %                                  |
| 510 | Total         | [Percentages must add to 0 or 100.]   | %                                      | 100.00 %                               |

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below.

|   | (a)            | (b)                          |
|---|----------------|------------------------------|
|   | Total Revenues | Interstate and International |
| Revenues from resellers that do not contribute to Universal Service | \$ N/A         | \$ N/A                       |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A  
February 2002

## 2002 FCC Form 499-A Telecommunications Reporting Worksheet

Page 7

601 Filer 499 ID [from Line 101]

81226

602 Legal name of reporting entity [from Line 102]

WORLD-LINK SOLUTIONS, INC.

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

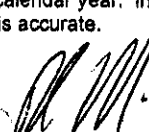
Universal Service ☐TRS ☐NANPA ☐LNP Administration ☐

Provide explanation below:

604 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☐

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate.

605 Signature



606 Printed name of officer

PAUL STAMOULIS

607 Position with reporting entity

CEO

608 Date

01/08/04

609 Check those that apply:

☐ Original April 1 filing for year☐ New filer, registration only☐ Revised filing with updated registration☒ Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: Form 499 c/o NECA, 80 South Jefferson Road, Whippany, New Jersey 07981

For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information: (973) 560-4460 or via e-mail: Form499@neca.org

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A  
February 2002

# **ATTACHMENT**

**B**

2002 499-A Second Revision

dated 6/25/03

## 2002. FCC Form 499-A Telecommunications Reporting Worksheet

Approval by OMB  
3060-0855

&gt;&gt;&gt; Please read instructions before completing. &lt;&lt;&lt;

Annual Filing -- due April 1.

## Block 1 Contributor Identification Information

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in Lines 104 or 112. See instructions.

101 Filer 499 ID [If you don't know your number, contact the administrator at (973)-560-4460.

If you are a new filer, leave blank and a Filer 499 ID will be assigned to you.]

812286

102 Legal name of reporting entity

World-Link Solutions Inc.

103 IRS employer identification number

13-4164619

104 Name telecommunications service provider is doing business as

World-Link Solutions Inc.

105 Principal communications business [Check the one that best describes the reporting entity -- see directions. Check one box only.]

☐ CAP/LEC☐ Cellular/PCS/SMR (wireless telephony incl. by resale)☐ Incumbent LEC☐ Interexchange Carrier (IXC)☐ Local Reseller☐ Operator Service Provider (OSP)☐ Paging & Messaging☐ Payphone Service Provider☐ Prepaid Card☐ Private Service Provider☐ Satellite Service Provider☐ Wireless Data☐ Shared-Tenant Service Provider / Building LEC☐ SMR (dispatch)☒ Toll Reseller☐ Other Toll

If Other Local, Other Mobile or Other Toll is checked,

☐ Other Local☐ Other Mobile

describe carrier type / services provided:

106 Holding company (All affiliated companies must show the same name on this line.)

107 FCC Registration Number (FRN) [ <https://svarsfoss2.fcc.gov/cores/CoresHome.html> ]  
[For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov]

000 909 6363

108 Management company (If carrier is managed by another entity)

109 Complete mailing address of reporting entity  
corporate headquarters

1 Wall St. Court, Floor 5, NY, NY 10005

110 Complete business address for customer inquiries and complaints  
[If different from address entered on Line 109]

Same.

111 Telephone number for customer complaints and inquiries [Toll-free number if available]

(212) - 444 3000 1 800 750 8353

112 All trade names that you have used in the past 3 years in providing telecommunications  
services. This should include all names by which you are identified on customer bills.

a World-Link Solutions, Inc.

b

c

d

e

f

g

h

i

j

k

l

m

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1101

FCC Form 499-A  
February 2002

## 2002 FCC Form 499-A Telecommunications Reporting Worksheet

Page 2

## Block 2-A: Regulatory Contact Information

|   |   |
|---|---|
| 201 Filer 499 ID [from Line 101]  | 812286  |
| 202 Legal name of reporting entity [from Line 102]  | World-Link Solutions Inc.                               |
| 203 Person who completed this worksheet   | Ann-Marie DiGennaro, CPA                                |
| 204 Telephone number of this person   | (212) 444 3000 x3031                                    |
| 205 Fax number of this person   | (212) 430 7055  |
| 206 E-mail of this person   |   |
| 207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent  | One Wall Street Court, SM A<br>New York, New York 10005 |
| 208 Billing address and billing contact person:<br>[Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.] | Accounts Payable  |

## Block 2-B: Agent for Service of Process

All carriers must complete Lines 209 through 213.

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in this section. See Instructions.

|  |       |
|--|-------|
| 209 D.C. Agent for Service of Process per 47 U.S.C. 413                              |       |
| 210 Telephone number of D.C. agent   | ( ) - |
| 211 Fax number of D.C. agent   | ( ) - |
| 212 E-mail of D.C. agent   |       |
| 213 Complete business address of D.C. agent for hand service of documents            | NIA   |
| 214 Local/alternate Agent for Service of Process (optional)                          |       |
| 215 Telephone number of local/alternate agent  | ( ) - |
| 216 Fax number of local/alternate agent  | ( ) - |
| 217 E-mail of local/alternate agent  |       |
| 218 Complete business address of local/alternate agent for hand service of documents |       |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A

February 2002

# 2002 FCC Form 499-A Telecommunications Reporting Worksheet

Page 3

## Block 2-C: FCC Registration and Contact Information

Carriers must refile Blocks 1, 2 and 6

If there are any changes in this section. See instructions.

|   |   |
|---|---|
| 219 Filer 499 ID [from Line 101]  | 812286  |
| 220 Legal name of reporting entity [from Line 102]  | World-Link Solutions, Inc.                                    |
| 221 Chief Executive Officer (or, highest ranking company officer if the filing entity does not have a chief executive officer)  | Paul A. Stanioulis  |
| 222 Business address of individual named on Line 221  | check if same as Line 109 <input checked="" type="checkbox"/> |
| 223 Second ranking company officer, such as Chairman, but not the individual listed on Line 221                                 | Evan Ioannou.   |
| 224 Business address of individual named on Line 223  | check if same as Line 109 <input checked="" type="checkbox"/> |
| 225 Third ranking company officer, such as President or Secretary, but not either of the individuals listed on Lines 221 or 223 |   |
| 226 Business address of individual named on Line 225  | check if same as Line 109 <input type="checkbox"/>            |

227 Indicate jurisdictions in which the filing entity provides telecommunications service. Include jurisdictions in which service was provided in the past 15 months and jurisdictions in which service is likely to be provided in the next 12 months.

|  |  |   |  |  |
|--|--|---|--|--|
| <input type="checkbox"/> Alabama               | <input type="checkbox"/> Guam                | <input checked="" type="checkbox"/> Massachusetts | <input checked="" type="checkbox"/> New York       | <input type="checkbox"/> Tennessee           |
| <input type="checkbox"/> Alaska                | <input type="checkbox"/> Hawaii              | <input type="checkbox"/> Michigan                 | <input type="checkbox"/> North Carolina            | <input type="checkbox"/> Texas               |
| <input type="checkbox"/> American Samoa        | <input type="checkbox"/> Idaho               | <input type="checkbox"/> Midway Atoll             | <input type="checkbox"/> North Dakota              | <input type="checkbox"/> Utah                |
| <input type="checkbox"/> Arizona               | <input checked="" type="checkbox"/> Illinois | <input type="checkbox"/> Minnesota                | <input type="checkbox"/> Northern Mariana Islands  | <input type="checkbox"/> U.S. Virgin Islands |
| <input type="checkbox"/> Arkansas              | <input type="checkbox"/> Indiana             | <input type="checkbox"/> Mississippi              | <input type="checkbox"/> Ohio                      | <input type="checkbox"/> Vermont             |
| <input checked="" type="checkbox"/> California | <input type="checkbox"/> Iowa                | <input type="checkbox"/> Missouri                 | <input type="checkbox"/> Oklahoma                  | <input checked="" type="checkbox"/> Virginia |
| <input type="checkbox"/> Colorado              | <input type="checkbox"/> Johnston Atoll      | <input type="checkbox"/> Montana                  | <input type="checkbox"/> Oregon                    | <input type="checkbox"/> Wake Island         |
| <input type="checkbox"/> Connecticut           | <input type="checkbox"/> Kansas              | <input type="checkbox"/> Nebraska                 | <input checked="" type="checkbox"/> Pennsylvania   | <input type="checkbox"/> Washington          |
| <input type="checkbox"/> Delaware              | <input type="checkbox"/> Kentucky            | <input type="checkbox"/> Nevada                   | <input type="checkbox"/> Puerto Rico               | <input type="checkbox"/> West Virginia       |
| <input type="checkbox"/> District of Columbia  | <input type="checkbox"/> Louisiana           | <input type="checkbox"/> New Hampshire            | <input type="checkbox"/> Rhode Island              | <input type="checkbox"/> Wisconsin           |
| <input checked="" type="checkbox"/> Florida    | <input type="checkbox"/> Maine               | <input checked="" type="checkbox"/> New Jersey    | <input checked="" type="checkbox"/> South Carolina | <input type="checkbox"/> Wyoming             |
| <input checked="" type="checkbox"/> Georgia    | <input checked="" type="checkbox"/> Maryland | <input type="checkbox"/> New Mexico               | <input type="checkbox"/> South Dakota              |  |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A  
February 2002

301 Filler 499 ID [from Line 101]

301 Filler 499 ID [from Line 101]

302 Legal name of reporting entity (from Line 102)

Report billed revenues for January 1 through December 31, 2001. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.

See instructions regarding percent interstate & international.

Revenues from Services Provided for Resale by Other Contributors to Federal Universal Service Support Mechanisms

Fixed local service 303 Monthly service, local calling, connection charges, vertical features,

and other local exchange service including subscriber line and PICC charges to IXCs

|   |   |
|---|---|
| a | Provided as unbundled network elements (UNEs) |
| b | Provided under other arrangements             |

304 Per-minute charges for originating or terminating calls

b Provided as unbundled network elements or other contract arrangements

|     |   |
|-----|---|
| 305 | Local private line & special access service |
| 306 | Payphone compensation from toll carriers    |

|     |   |
|-----|---|
| 307 | Other local telecommunications service revenues |
|-----|---|

308 Universal service support revenues received from Federal or state source

309 Monthly, activation, and message charges except toll

~~Toll services~~ 310 Operator and toll calls with alternative billing arrangements (credit)

card, collect, international call-back, etc.)

service, "10-10" calls, associated monthly account maintenance, PCCC

312 Long distance private line services

313 Satellite services

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHOPS

\_\_\_\_\_

# 2002 FCC Form 499-A Telecommunications Reporting Worksheet

Page 5

|   |  |                           |   |                   |  |
|---|--|---------------------------|---|-------------------|--|
| 401   | Filer 499 ID (from Line 101)   | 812286                    |   |                   |  |
| 402   | Legal name of reporting entity (from Line 102)   | World-Link Solutions Inc. |   |                   |  |
| Report billed revenues for January 1 through December 31, 2001.<br>Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.<br>See instructions regarding percent interstate & international. |  | Total Revenues            | If breakouts are not book amounts, enter whole percentage estimates |                   | Breakouts  |
| Revenues from All Other Sources (end-user telecom. & non-telecom.)  |  | (a)                       | Interstate (b)  | International (c) | Interstate Revenues (d) International Revenues (e) |
| 403   | Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions   | \$269,119                 |   |                   | 52,238 216,882                                     |
| <u>Fixed local services</u>   |  |                           |   |                   |  |
| 404   | Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PISC charges   |                           |   |                   |  |
| 405   | PISC charges levied by a local exchange carrier on a no-PIC customer and Tariffed subscriber line charges  |                           |   |                   |  |
| 406   | Local private line and special access service  |                           |   |                   |  |
| 407   | Payphone coin revenues (local and long distance)   |                           |   |                   |  |
| 408   | Other local telecommunications service revenues  |                           |   |                   |  |
| <u>Mobile services (including wireless telephony, paging &amp; messaging, and other mobile services)</u>  |  |                           |   |                   |  |
| 409   | Monthly and activation charges   |                           |   |                   |  |
| 410   | Message charges including roaming, but excluding toll charges  |                           |   |                   |  |
| <u>Toll services</u>  |  |                           |   |                   |  |
| 411   | Prepaid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards  |                           |   |                   |  |
| 412   | International calls that both originate and terminate in foreign points  | 521,684                   | 0%  | 100%              | 521,684  |
| 413   | Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenues reported on Line 412   |                           |   |                   |  |
| 414   | Ordinary long distance (direct-dialed MTS, customer toll-free 800/888 service, "10-10" calls, associated monthly account maintenance, PISC pass-through, and other switched services not reported above)   | 6,959,598                 | 19  | 81                |  |
| 415   | Long distance private line services  |                           |   |                   |  |
| 416   | Satellite services   |                           |   |                   |  |
| 417   | All other long distance services   |                           |   |                   |  |
| 418   | Information services, inside wiring maintenance, billing and collection, customer premises equipment, published directory, dark fiber, Internet access, cable TV program transmission, foreign carrier operations, and non-telecommunications revenues (See instructions.) |                           |   |                   |  |
| 419   | Gross billed revenues from all sources (incl. reseller & non-telecom.) [Lines 303 through 314 plus Lines 403 through 418]  | 7,750,401                 |   |                   |  |
| 420   | Universal service contribution bases [Lines 403 through 411 & Lines 413 through 417]   | 7,228,717                 |   |                   | 1373456.23 5855280.27                              |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001



## 2002 FCC Form 499-A Telecommunications Reporting Worksheet

Page 6

## Block 5: Additional Revenue Breakdown

|  |                           |
|--|---------------------------|
| 501 Filer 499 ID (from Line 101)                   | 812286                    |
| 502 Legal name of reporting entity (from Line 102) | World-Link Solutions, Inc |

Most filers must contribute to LNP administration and must provide the percentages requested in Lines 503 through 510. Filing entities that use Line 603 to certify that they are exempt from this requirement need not provide this information.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

|     |               |   | Block 3<br>Carrier's<br>Carrier<br>(a) | Block 4<br>Encl-User<br>Telecom.<br>(b) |
|-----|---------------|---|--|---|
| 503 | Southeast:    | Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands        | %                                      | 7.98 %                                  |
| 504 | Western:      | Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming | %                                      | 3.19 %                                  |
| 505 | West Coast:   | California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island                           | %                                      | 29.45 %                                 |
| 506 | Mid-Atlantic: | Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia   | %                                      | 27.42 %                                 |
| 507 | Mid-West:     | Illinois, Indiana, Michigan, Ohio, and Wisconsin  | %                                      | 2.83 %                                  |
| 508 | Northeast:    | Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont   | %                                      | 28.65 %                                 |
| 509 | Southwest:    | Arkansas, Kansas, Missouri, Oklahoma, and Texas   | %                                      | .48 %                                   |
| 510 | Total         | [Percentages must add to 0 or 100.]   | %                                      | 100.00 %                                |

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below.

|   | (a)            | (b)                          |
|---|----------------|------------------------------|
|   | Total Revenues | Interstate and International |
| Revenues from resellers that do not contribute to Universal Service | \$ N/A         | \$ N/A                       |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A  
February 2002

## 2002 FCC Form 499-A Telecommunications Reporting Worksheet

Page 7

Block 6: CERTIFICATION: to be signed by an officer of the filer

601 Filer 499 ID [from Line 101]

812286

602 Legal name of reporting entity [from Line 102]

World-Link Solutions, Inc.

Section IV of the Instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

Universal Service ☐TRS ☐NANPA ☐LNP Administration ☐

Provide explanation below:

604 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.



I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate.

605 Signature

606 Printed name of officer

607 Position with reporting entity

608 Date

June 25, 2003

609 Check those that apply:

☐ Original April 1 filing for year☐ New filer, registration only☐ Revised filing with updated registration☒ Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: Form 499 c/o NECA, 80 South Jefferson Road, Whippany, New Jersey 07981

For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Information: (973) 560-4460 or via e-mail: Form499@neca.org

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A  
February 2002

# **ATTACHMENT**

**C**



## Universal Service Administrative Company

Collections Department  
For billing inquiries call (888) 641-8722

---

July 24, 2004

World - Link Solutions, Inc.  
Accounts Payable  
1 Wall Street Ct.  
5th Floor  
New York, NY 10005

RE: Filer 499 ID 812286

Dear Contributor,

As of June 30, 2003, our records indicate we have not received a payment for your entire account balance that was due June 13, 2003. The portion of your account balance that is now under 30 days past due totals \$81,194.08.

If you have already mailed this payment, we apologize for the inconvenience and you may disregard this notice. If you have neglected to pay your account balance in full, we ask that you do so immediately.

Your account is currently accruing late payment fees and will continue to do so until we receive payment for your past due balance.

Sincerely,

USAC Collections Department

# **ATTACHMENT**

**D**



Universal Service Administrative Company

August 27, 2003

World-Link Solutions, Inc.  
One Wall St. Court  
5<sup>th</sup> Floor  
New York, NY 10005

Filer 499 ID: 812286

Attn: Ann-Marie DiGiennaro

RE: 2002 Form 499-A Revision Rejection

The Universal Service Administrative Company (USAC) has completed a review of the Revised FCC Form 499-A that you submitted for the purpose of revising revenue reported by World-Link Solutions, Inc. for the period January 1 – December 31, 2001. Based on the information provided, we are unable to accept the revision because it was not filed within one year of the original submission.

USAC recognizes that you may disagree with our decision. **If you wish to file an appeal, your appeal must be postmarked no later than 60 days after the date of this letter.**

In the event that you choose to appeal the decision, you should follow these guidelines:

- Write a "Letter of Appeal to USAC" explaining why you disagree with this Revised Form 499-A Rejection letter and identify the outcome that you request;
- Mail your letter to:  
Letter of Appeal  
USAC  
2120 L Street, NW, Suite 600  
Washington, DC 20037
- Appeals submitted by fax, telephone call, and e-mail **will not** be processed.
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Identify the "Legal Reporting Name" and "Filer 499 ID."

- Explain the appeal to the USAC. Please provide documentation to support your appeal.
- Attach a photocopy of this Revised Form 499-A Rejection decision that you are appealing.

USAC will review all "letters of appeal" and respond in writing within 90 days of receipt thereof.

The response will indicate whether USAC:

- (1) agrees with your letter of appeal, and approves an outcome that is different from the Revised Form 499-A Rejection Letter; or
- (2) disagrees with your letter of appeal, and the reasons therefor.

If you disagree with the USAC response to your "letter of appeal," you may file an appeal with the FCC within 60 days of the date USAC issued its decision in response to your "Letter of Appeal." The FCC address where you may direct your appeal is:

Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Please be sure to indicate the following information on all communications with the FCC:  
"Docket Nos. 96-45 and 97-21."

**In the alternative**, you may write and send an appeal letter directly to the Federal Communications Commission (FCC), and bypass USAC. Your letter of appeal to the FCC must explain why you disagree with the USAC decision. You are also encouraged to submit any documentation that supports your appeal. The FCC rules governing the appeals process (Part 54 of Title 47 of the Code of Federal Regulations 54.719 – 54.725) are available on the FCC web site ([www.fcc.gov](http://www.fcc.gov)).

If you have questions or concerns regarding this letter, please contact Lisa-Tubbs at (973) 884-8116 or Christy Doleshal at (973) 560-4428.

Sincerely,

**USAC**

# **ATTACHMENT**

**E**





6 Post due  
Federal Communications Commission  
Washington, D.C. 20554  
Le Heng

September 6, 2003

World-Link Solutions, Inc.  
1 Wall Street Ct. 5<sup>th</sup> Floor  
New York, NY 10005  
Attn: Ann Marie DiGennaro

**RE: IMPORTANT INFORMATION DO NOT DISCARD -FINAL DEMAND AND  
NOTICE OF DEBT TRANSFER**

World-Link Solutions, Inc.  
0009-0963-63  
03US000005

The Universal Service Administrative Company (USAC) notified the entity referenced above (You or Debtor) previously and provided other correspondence concerning a Debt due and payable to the federal Universal Service Fund (USF) (a debt owed to the United States). The Debt results from Debtor's non-payment of USF contributions. Because Debtor failed to pay this Debt and the accrued administrative charges, it has been referred to the Federal Communications Commission (Commission or FCC) for further collection effort. The Commission has determined that the outstanding Debt, including presently accrued administrative charges owed to the USF is \$ 559,244.69 to date. This Notice is a Demand for payment to be remitted no later than 30 days from the date of this Notice.

**THE FOLLOWING PROVISIONS PROVIDE IMPORTANT INFORMATION AND A  
DESCRIPTION OF LEGAL RIGHTS AND OBLIGATIONS**

1. Debtor is cautioned that failure to remit the demanded payment on or before the Last Due Date will result in further sanctions, including, but not limited to, the initiation of proceedings to recover the outstanding debt, together with any applicable administrative charges, penalties, and interest pursuant to the provisions of the Debt Collection Act of 1982 (Public Law 97-365) and the Debt Collection Improvement Act of 1996 (Public Law 104-134), as amended (the DCIA), as set forth below.

2. If we do not receive full payment of the outstanding Debt plus accrued administrative charges within 30 days of the date of this letter (Last Due Date), pursuant to the DCIA, You may incur additional charges and costs, and we will transfer the Debt to the United States Department of Treasury (Treasury) or the United States Department of Justice for debt collection. The FCC has determined that the funds are owed to the United States pursuant to the provisions of 31 U.S.C. § 3701 and 47 U.S.C. § 254. Because the unpaid amount is a debt owed to the United States, we are required by the DCIA to impose interest, processing charges, and penalties (31 U.S.C. § 3717(e)), and to inform You what may happen if You do not pay the full outstanding debt. Under the DCIA, the United

States will charge interest from the date of this notice (Demand Date), you will be required to pay the administrative costs of processing and handling a delinquent debt to date, as well as the administrative costs as set by the Treasury (currently 18% of the debt), and You will be charged an additional penalty of 6% a year for any part of the debt that is more than 90 days past due. Interest on the outstanding debt (DCIA Interest) will be assessed at the published investment rate for the Treasury tax and loan accounts (Treasury Current Value of Funds Rate). However, if You pay the full amount of the outstanding Debt and associated administrative costs and penalties within 30 days of the Demand Date, the DCIA Interest will be waived. These requirements are set out at 31 U.S.C. § 3717.

3. When we transfer the Debt (to the Treasury), You may be subject to other administrative proceedings. Your failure to pay the Debt may be reported to credit bureaus (see 31 U.S.C. § 3711(e)), the Debt will be considered for administrative offset (see 31 U.S.C. § 3716), the Debt may be further transferred to collection agencies (see 31 U.S.C. §§ 3711 & 3718), and also the Debt may be referred to the United States Department of Justice or agency counsel for litigation. In that situation, You may be subject to additional administrative costs that result from the litigation. Moreover, pursuant to 31 U.S.C. § 3720B, a person owing an outstanding nontax debt that is in delinquent status shall not be eligible for Federal financial assistance. You should be aware that the discharge of any portion of the debt may be reported to the Internal Revenue Service as potential taxable income.

#### Rights of Inspection, Review, and Repayment Agreement

4. You (through Your previously designated authorized representative) have a right to inspect and copy the invoices and other records that are pertinent to Your Debt, and You may request that we review the records pertaining to the Debt and You may, in connection with that request and review, present evidence that all or part of the Debt is not past due or legally enforceable. Finally, You have an opportunity to enter into a written repayment agreement (Promissory Note) to pay the full amount of the Debt. In that case, You must first provide evidence that demonstrates financial inability to pay the debt in one payment. Your claim of financial inability to pay in one payment is subject to verification (see 31 CFR § 901.8), and if Your request is approved for further processing, You will be required to execute a written agreement suitable to the Commission. If You desire to exercise any of these above described rights, You must do so in writing delivered to and received at the address below within 10 (ten) days of the Demand Date. Any required evidence must be submitted at the same time that You submit your request. Failure to provide the written request (and, as appropriate, the required evidence) within the stated time is a waiver of these rights.

5. You may notify us in writing by mail or email to the following addresses:

Federal Communications Commission  
Attn: Revenue and Receivables Operations Group  
445 12<sup>th</sup> Street S.W., Room 1-A821  
Washington, DC 20554

Email: [ARINQUIRIES@fcc.gov](mailto:ARINQUIRIES@fcc.gov)

When You pay the Debt, your remittance must be delivered in a manner so as be received on or before the Last Due Date by the Commission at the following address:

Federal Communications Commission  
P.O. Box 358340  
Pittsburgh, PA 15251-5340

If the Commission does not receive the full payment of the Debt (as computed to the date of payment) by the Last Due Date, the Commission will promptly transfer the Debt to the Treasury or the United States Department of Justice for collection. As noted above, transfer of the Debt may result in sanctions, including, but not limited to, substantial additional costs and fees pursuant to the provisions of the DCIA.

If this debt has been satisfied or otherwise mitigated, You/Debtor must, before the Last Due Date, provide evidence satisfactory to the Commission, such as a verified copy of the cancelled check, which satisfied the full amount of the Debt, or a Resolution Letter issued by USAC or the Commission, together with a copy of this Notice to the Commission at the following address:

Federal Communications Commission  
Attn: Revenue and Receivables Operations Group  
445 12<sup>th</sup> Street S.W., Room 1-A821  
Washington, DC 20554

If You have any questions, please contact the Revenue and Operations Group at (202) 418-1995 or by email to [ARINQUIRIES@fcc.gov](mailto:ARINQUIRIES@fcc.gov).

Sincerely,



Claudette E. Pride  
Chief  
Revenue and Operations Group

## Federal Communications Commission

## BILL FOR COLLECTION

FOR INQUIRIES CALL  
1-202-418-1995  
(Revenue & Receivable Ops Group)

|   |                                      |                   |
|---|--------------------------------------|-------------------|
| Bill Number   |                                      | Current Bill Date |
| 03US000005  |                                      | 9/06/03           |
| PAYER FRN#  | APPLICANT FRN#                       |                   |
|   | 0009096363                           |                   |
| World-Link Solutions Inc.<br>1 Wall Street Court, Floor 5<br><br>NY, NY 10005   |                                      |                   |
| Payable to:<br>Federal Communications Commission<br>Send a copy of this bill to:<br>Federal Communications Commission<br>REVENUE & RECEIVABLE OPER.<br>P.O. BOX 358340<br>PITTSBURGH, PA 15251-8340 |                                      |                   |
| Total Amount Due  |                                      | Due Date          |
| \$559,244.69  | Total Amount Due Must Be Received By | 10/05/03          |

## SPECIAL INSTRUCTIONS (OPTIONAL)

## PAYER FCC REGISTRATION NUMBER (FRN) REQUIRED

USAC FINAL DEMAND BILLING ATTN: ANN MARIE DIGENNARO

FCN: CALL SIGN:

PAYER ADDRESS:

Please write your bill number on your remittance.

Please attach a copy of this bill to your payment to ensure proper credit.

| PTC       | Quantity | Fee Due      |
|-----------|----------|--------------|
| USAC      | 0        | \$559,244.69 |
| Total Due |          | \$559,244.69 |

Payment Method: Check ☐ (Attach)  
Credit Card ☐ (Complete Below)☐ MasterCard☐ American Express☐ VISA☐ Discover

Account No:

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|

Expiration:

|  |  |
|--|--|
|  |  |
|--|--|

Month

|  |  |
|--|--|
|  |  |
|--|--|

Year

I hereby authorize the FCC to charge my Credit Card for the service(s) / authorization(s) herein described.

AUTHORIZED SIGNATURE

DATE

# **ATTACHMENT**

**F**

# The Helein Law Group, P.C.

# FILE COPY

8180 Greensboro Drive  
Suite 700  
McLean, VA 22102

(703) 714-1300 (Telephone)  
(703) 714-1330 (Facsimile)  
mail@thglaw.com

Management Consulting Group  
GTC Consultants, Inc.  
(703) 714-1307 (Telephone)

Writer's Direct Dial Number  
(703) 714-1313

Writer's Email Address  
jsm@thglaw.com

October 27, 2003

## VIA OVERNIGHT DELIVERY

Letter of Appeal  
USAC  
2120 L Street, N.W.  
Suite 600  
Washington, D.C. 20037

Re: Letter of Appeal to USAC - World-Link Solutions, Inc.

Ladies and Gentlemen:

World-Link Solutions, Inc. (World-Link), by its attorneys, submits this Letter of Appeal in response to USAC's "2002 Form 499-A Revision Rejection" dated August 27, 2003.

World-Link disagrees with USAC's decision refusing to adjust the company's Universal Service Fund (USF) contributions for the period January 1 - December 31, 2001 (herein referred to as "Year 2001"). The basis for World-Link's disagreement is that the contribution obligation for Year 2001 is based on the inadvertent inclusion of non-jurisdictional revenues on World-Link's 2002 Form 499-A.

World-Link inadvertently included revenues generated by its wholesale carrier operations. Attached hereto are the calculations that show what World-Link's jurisdictional revenues were for Year 2001; what World-Link has paid toward Year 2001 and the following year's contributions; what World-Link recognizes as unpaid contributions and the proper amount of late payment assessments being owed thereon; and what World-Link owes to day after the Year 2001 revenues are properly adjusted by restating its revenues less the non-jurisdictional revenues.

Pursuant to Section 254(d) of the Communications Act of 1934, as amended, (the "Act") (47 U.S.C. § 254(d), "every telecommunications carrier that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory

Telecommunications  
E Commerce  
Technology  
Corporate & Finance  
Trademarks  
Proprietary Rights  
Complex Litigation  
General Business Law

basis ... to preserve and advance universal service." (Emphasis added.) Section 3 (46) of the Act (47 U.S.C. § 153 (46) defines "telecommunications service" as "the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used." (Emphasis added.)

World-Link inadvertently included in the revenues reported in its 2002 499-A Form revenues that were not received by reason of its providing telecommunications services. By statutory definition, such revenues are not subject to the requirements of Section 254 of the Act. To rectify the inadvertent error, World-Link's revenues for Year 2001 must be restated; its contributions recalculated based on the correct amount of revenues for this period; and the late payment assessments recalculated based on the correct revenue figure and the late paid or unpaid contributions amounts adjusted to reflect the corrected restatement of revenues.

Since no agency may act outside the scope of its jurisdiction as delegated by Congress, the Commission's rules promulgated in accordance with the authority delegated to it in Section 254 are necessarily limited to assessing USF contributions based on revenues derived from carriers' that provide telecommunications services. The non-jurisdictional revenues erroneously reported on the 2002 499-A Form were not derived from telecommunications services as defined in the Act.

Jurisdiction is fundamental to the exercise of authority. Its lack may never be waived and an objection to the exercise of authority based on the lack of jurisdiction is never untimely. The lack of jurisdiction may be raised at any point in a regulatory process. For these reasons, the application of a rule purporting to limit the time within which a carrier may correct errors in its 499-A Forms is not properly applied when the basis for the correction is the lack of jurisdiction.

Hence, World-Link has a right to have its 2002 499-A Form revised and its obligations for contributions adjusted so that they are based only on jurisdictional revenues. Fully supporting this conclusion is other express language of Section 254. As quoted above, carriers are required to contribute only on an equitable and non-discriminatory basis. A carrier required to contribute based on revenues no other carriers are required to make their contributions is clearly not being treated equitably or in a non-discriminatory manner.

Based on these considerations, World-Link seeks to have its USF contribution obligations and its late payment assessments reviewed and adjusted as indicated in Attachment A.

World-Link's contact information is as follows:

For the legal issues on which this appeal is based, the contact is:

Jonathan S. Marashlian

The Helein Law Group, P.C.

8180 Greensboro Drive, Suite 800  
McLean, VA 22102  
703-714-1313  
703-714-1330 (fax)  
[jsm@thlglaw.com](mailto:jsm@thlglaw.com)

Mr. Marashlian will be assisted in presenting the factual aspects underlying this appeal by:

Evan Ioannou  
Managing Director  
World-Link Solutions, Inc.  
One Wall Street Court  
5<sup>th</sup> Floor  
New York, NY 10005  
212-444-3000 x3035  
212-430-7055 (fax)  
[evan@world-link.com](mailto:evan@world-link.com)

Legal Reporting Name: World-Link Solutions, Inc.  
Filer 499 ID: 812286

In addition to Attachment A, additional documentation supporting this appeal is attached.

A photocopy of USAC's Revised Form 499-A Rejection decision that is being appealed is attached.

Appeal submitted,

By

  
Jonathan S. Marashlian

The Helein Law Group, P.C.  
8180 Greensboro Drive, Suite 700  
McLean, VA 22102  
703-714-1300  
703-714-1330 (fax)  
[mail@thlglaw.com](mailto:mail@thlglaw.com)



Attachment A  
Exempt From Public Disclosure  
Pursuant to FCC Rule 0.459  
47 C.F.R. § 0.459

World-Link Solutions, Inc.  
Letter of Appeal

Adjusted 2002 499-A Form Calculations

Incorrect total revenues reported for Year 2001 and 2002 Form 499-A are:  
**\$10,891,925.**

Actual jurisdictional revenues for Year 2001 and 2002 Form 499-A are:  
**\$7,228,717**

Total non-jurisdictional revenues to be excluded on adjustment: **\$3,663,208**

Gross contributions on erroneous total revenues: **\$793,476.74**

Correct USF contributions based on jurisdictional revenues are: **\$526,612.08**

Excessive amount of contributions: **\$266,864.66.**

USF Contributions Paid Year 2001: **\$145,478.63**

USF Contributions Shortfall on Correct Revenues: **\$381,133.45**

Late Fees Paid for Year 2001: **\$13,879.30**

Late Fees Billed by USAC for Year 2001: **13,622.13**

Overpayment: **\$ 257.17**

Total USF Shortfall for Year 2001: **\$381,133.45**

Less Late Fee Overpayment: **- 257.17**

Correct Total Overdue: **\$380,876.28**

Special Note: World-Link has calculated its USF obligations through October 2003, including late payment assessments. In a separate filing to be made shortly, World-Link will provide a consolidated statement of its USF obligations in order to provide a current amount it will recognize as being owed. World-Link will also propose a plan for retiring this obligation based on the adjusted amounts due for Year 2001 as set forth above subject to a grant of this appeal.